

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Complaint Regarding Postal Service Offering DOCKET # MC2012-26
ENHANCED SERVICES PRODUCT FOR COMPETITIVE PO BOXES

COMMENTS OF ORANGE HILL MAILBOX
August 7, 2012

I am the owner of a small business which is a Commercial Mail Receiving Agency (CMRA). I began this business in 1982. In the ensuing 30+ years I have employed several of my own children and several, non related, local young people as well. These jobs were an important first step for all of those I employed, introducing them to responsibilities, earning a paycheck, dealing with people and many other important & valuable skills.

I have some comments about the United States Postal Service venturing into additional services for their PO Boxes. While it has been determined that those boxes are competitive with our Private Mail Boxes (PMB)'s there are still distinct differences that set them apart from our Private Mail Boxes (PMB).

The new service of email notification, being offered by the USPS, is a new service. The USPS has not been NOTIFYING their PO Box customers in the past. The service requires labor and technology to implement and maintain. These items have a cost and to say they are included in the base cost of a PO Box, when the service is new, contradicted the statements made by the USPS that they are already providing these services and that they are bundled into the PO Box rental fee. If the services were available in the past this may be true but as new services there is a clear difference between the past and the present.

The second new service which is now available is street addressing for private carrier delivery to the PO Box. I have a few objections to this.

1: The USPS claims that some companies will not deliver their products to a PO Box due to fraud. By masking the actual PO Box with a street address USPS is assisting in deceiving the merchants that they are not shipping goods to a PO Box. The USPS is going to cause my business harm in the same manner that they are deceiving the merchant. Once it becomes common knowledge that the USPS is using the # sign to mask their PO Boxes, CMRA addressing will be swept up with that same brush and we will end up losing customers because of the required addressing standards that the USPS has imposed on CMRA's.

2: The acceptance of the packages at the street address causes a conflict with the USPS policy and procedures of getting a signature for accountable, insurable and registered mail products. The expectation and legal right of the mailer is being misused and deceived by the blanket acceptance form the USPS will require for the acceptance of mail at the street address. Is the acceptance of a package at the street address using the release sufficient to maintain the high standards of the registered mail piece, or the court recognized certified mail piece or even the USPS own standards for the insured mail piece?

3: Street addressing costs and logistics involved do not justify a no charge bundling of this service. By the USPS's own admission there is a cost involved in moving those packages from a receiving area to the delivery area. If there is cost then there needs to be postage to cover those costs. I cannot hand mail, directed to the local postmaster, to my letter carrier for internal delivery to a postmaster without placing a stamp on it, so everything handled by USPS personnel needs some sort of postage. While there has been a 25% increase in pricing nothing in the USPS filing shows a breakdown of costs to prove that the costs of implementing these specific new additional services is covered by the increase.

4: Mail forwarding will be provided at no charge for the PO Boxes. PMB's must pay to forward mail for their customers.

5: The USPS has not shown the detailed costs involved in providing the form completion, at the retail counter, the database support or the costs involved in physically storing these street address packages for pickup at the retail counter. Additionally the time spent, at the retail counter, retrieving and handing said packages over to the mailbox holder have not been detailed.

In conclusion, email notification and street addressing as premium service doesn't seem to be what the public wants. With 66,000 mailbox customers canceling or not renewing in the first 6 months of the program, it raises the question of what the PO Box customer really wants. In my experience the PO Box customer wants an inexpensive place to receive their mail and generally know when their mail is placed in the PO Box. These services are adding costs to people and businesses who are value purchasers rather than convenience and service customers. For all the reasons I have outlined I feel that these services are not benefiting the USPS and in fact have the chance of further damaging the high standards the USPS operates under.

I also realize that the USPS is currently facing many serious challenges, both financial and operational. It is impossible to rectify these challenges on the backs of the CMRA's and related businesses. The unfair competition would simply wipe out the CMRA industry and not make a dent in the huge deficits the USPS is currently racking up. Both the USPS and the citizens of the USA would be far better served if the root causes of the problems were addressed.

Thank you for your consideration on this matter.

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